

1 McGREGOR W. SCOTT  
United States Attorney  
2 KEVIN C. KHASIGIAN  
Assistant U. S. Attorney  
3 501 I Street, Suite 10-100  
Sacramento, CA 95814  
4 Telephone: (916) 554-2700

5 Attorneys for the United States  
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8 IN THE UNITED STATES DISTRICT COURT  
9 EASTERN DISTRICT OF CALIFORNIA  
10

11 UNITED STATES OF AMERICA,

12 Plaintiff,

13 v.

14 APPROXIMATELY \$827.04 SEIZED FROM  
PAYPAL ACCOUNT ASSIGNED TO EMAIL  
15 GABRIELALVA92@GMAIL.COM,

16 APPROXIMATELY \$8,975.10 SEIZED FROM  
DISCOVER BANK ACCOUNT NUMBER  
17 7016627348 IN THE NAME OF GABRIEL ALVA,

18 APPROXIMATELY \$885.10 SEIZED FROM  
ALLY BANK ACCOUNT NUMBER 1069206298  
19 IN THE NAME OF CATHERINE STUCKEY,

20 APPROXIMATELY \$4,984.84 SEIZED FROM  
CITI BANK ACCOUNT NUMBER 42011053883  
21 IN THE NAME OF CALIFITT, LLC,

22 APPROXIMATELY \$8,686.40 SEIZED FROM  
CITI BANK ACCOUNT NUMBER 206269441 IN  
23 THE NAME OF CALIFITT, LLC, AND

24 APPROXIMATELY \$445.98 SEIZED FROM  
WELLS FARGO BANK ACCOUNT NUMBER  
25 2018552089 IN THE NAME OF CATHERINE  
STUCKEY,

26 Defendants.  
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STIPULATION AND ORDER EXTENDING  
TIME FOR FILING A COMPLAINT FOR  
FORFEITURE AND/OR TO OBTAIN AN  
INDICTMENT ALLEGING FORFEITURE

1 It is hereby stipulated by and between the United States of America and potential claimants  
2 Gabriel Alva and Catherine Stuckey (“claimants”), by and through their respective counsel, as follows:

3 1. On or about August 6, 7, 9, and 12, 2019, the Homeland Security Investigation (“HSI”)  
4 seized the above-referenced defendant funds pursuant to Federal seizure warrants (hereafter collectively  
5 “defendant funds”).

6 2. Under 18 U.S.C. §§ 983(a)(1)(A)(i)-(iv), and 983(a)(3)(A), the United States is required to  
7 send notice to potential claimants, file a complaint for forfeiture against the defendant funds, or obtain an  
8 indictment alleging that the defendant funds are subject to forfeiture within one hundred and fifty days of  
9 seizure, unless the court extends the deadline for good cause shown or by agreement of the parties. That  
10 deadline is January 3, 2020.

11 3. As provided in 18 U.S.C. § 983(a)(3)(A), the parties wish by agreement to extend to  
12 March 3, 2020, the time in which the United States is required to file a civil complaint for forfeiture  
13 against the defendant funds and/or to obtain an indictment alleging that the defendant funds are subject to  
14 forfeiture.

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1 4. Accordingly, the parties agree that the deadline by which the United States shall be  
2 required to file a complaint for forfeiture against the defendant funds and/or to obtain an indictment  
3 alleging that the defendant funds are subject to forfeiture shall be extended to March 3, 2020.

4 Dated: 12/31/19

McGREGOR W. SCOTT  
United States Attorney

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6 By: /s/ Kevin C. Khasigian  
KEVIN C. KHASIGIAN  
Assistant U.S. Attorney

7  
8 Dated: 1/2/20

/s/ Stephen Kahn  
STEPHEN KAHN  
Attorney for potential claimant  
Gabriel Alva

9  
10 (Signature authorized by email)

11  
12 Dated: 1/2/20

/s/ Candice Fields  
CANDICE FIELDS  
Attorney for potential claimant  
Catherine Stuckey

13  
14 (Signature authorized by phone)

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16  
17 **IT IS SO ORDERED.**

18 Dated: \_\_\_\_\_

\_\_\_\_\_  
United States District Judge